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Attorneys for Class Representative and Class Counsel

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

In re NAVIENT CORPORATION SECURITIES LITIGATION

Master File No. 17-8373 (RBK/AMD)

DECLARATION OF JESSE WAYNE PRITCHARD

I, Jesse Wayne Pritchard, declare as follows:

- 1. I respectfully submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Settlement. I have personal knowledge of the statements herein and if called upon as a witness, could and would competently testify thereto.
- 2. I moved to be appointed as the lead plaintiff in this case almost four years ago on December 15, 2017. At that time, I submitted a declaration to the Court certifying, among other things, that: I had reviewed a complaint filed in the action; I did not purchase the security that is the subject of this action at the

direction of plaintiff's counsel or in order to participate in this private action; I was willing to serve as a representative party on behalf of the class, including providing testimony at deposition and trial, if necessary; and I would not accept any payment for serving as a representative party on behalf of the class beyond my pro rata share of any recovery, except as ordered or approved by the court, including any award for reasonable costs and expenses (including lost wages) directly relating to the representation of the class.

- 3. Since then, I have remained engaged and kept up to date with the various proceedings by staying in communication with my attorneys at Levi & Korsinsky, LLP. I have reviewed filings, including the complaints and numerous motions. I have also participated in discovery by providing documents in my possession that related to my transactions in Navient stock as well as giving testimony under penalty of perjury at a deposition.
- 4. I am in favor of settling this case for \$7,500,000. Given my familiarity with the issues in the case and the negotiations that took place during the mediation, the settlement presents a favorable outcome in my opinion. It will return a substantial amount of money to investors that lost money because of the alleged fraud concerning Navient's statements about its loan servicing practices. I, of course, am included amongst those investors and welcome the opportunity to put this matter to rest after years of litigation. The Court should grant Plaintiffs' motion and preliminarily approve the settlement.
- 5. My attorneys at Levi & Korsinsky will request an award for attorneys' fees and reimbursement of expenses. This award will compensate the firm for its time under our contingency fee arrangement. I understand that they will seek a fee equal to one-third of the settlement plus reimbursement of expenses. Given the result they obtained and the extensive amount of time and resources they invested in the case, I think their request is fair and well-deserved.

I declare under penalty of perjury that the foregoing is true and correct. Executed this // day of November 2021.

Jesse Wayne PRITCHARD